

Record of processing activity

EBA Alumni network

Record of EBA activities processing personal data, based on Article 31 of Regulation (EU) 2018/1725 (EUDPR)

Part 1 - Article 31 Record (publicly available)

1	Last update of this record	04/03/2025
2	Date of next review	04/03/2027
3	Reference number	EBA/DPR/2024/6
4	Name and contact details of controller	<p>Controller: European Banking Authority, Tour Europlaza, 20 avenue André Prothin, CS 30154, 92927 Paris La Défense CEDEX, France</p> <p>Responsible Department: OPER/HR</p> <p>Contact: eba-alumninetwork@eba.europa.eu</p>
5	Contact details of DPO	dpo@eba.europa.eu , or alternatively send a letter to the postal address of the EBA (address above) marked for the attention of the DPO of the EBA.
6	Name and contact details of joint controller (where applicable)	Not applicable
7	Name and contact details of processor (where applicable)	Not applicable
8	Short description and purpose of the processing activity	<p>The EBA Alumni network was established with the aim of creating occasions for the meaningful engagement of former EBA employees, as well as their continued involvement in relevant EBA activities, in view of maintaining the institutional proximity of the EBA and its former staff members.</p> <p>The network is meant to strengthen the understanding of EBA activities and policies among its former staff, by promoting their engagement with the EBA values beyond the organisation, to foster their collaboration in EBA initiatives, to enable networking activities</p>

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and the organisation of events, to share knowledge and information concerning the EBA (e.g., through the creation of a newsletter).

The data controller determining the purpose and means of the processing is the HR unit in the Operations department of the EBA (OPER/HR). The record covers the following processing activities:

1. Create and update a database for the EBA Alumni, in view of fostering collaboration and building synergies across organisation and sectors;
2. Provide the Alumni with information about specific meetings or events and to process their application to participate. Invite the Alumni to these or further events and online activities;
3. Facilitate networking and foster connections among the Alumni through the organisation of spontaneous local initiatives;
4. Provide information to the Alumni on important developments, activities, initiatives or thematic issues in areas falling under the remit of EBA policies, through a newsletter, articles, reports, interviews, as well as visual content;
5. Organise seminars/workshops, in presence or online;
6. Develop podcasts about the EBA activities;
7. Identify the Alumni and Alumni representatives for further collaboration and engagement;
8. Record audio-visual (virtually or in person) or conduct written interviews and publish them on the EBA website or publish them as articles;
9. Publish photos together with the interview/article on the EBA website, and promote it on the newsletter, other EU websites relevant to the project, as well as social media channels of the EU and Alumni Organisations (e.g. Facebook, Twitter, LinkedIn, Instagram, etc.);
10. Allow follow-up engagement (e.g. questionnaire post-event, future invitations to similar events for participants etc.).

Mode of processing

The HR unit extracts the personal data of former EBA employees (Temporary Agents, Contract Agents, Seconded National Experts (SNEs), short term SNEs, Visiting or Guest Experts, members on staff exchange, and trainees), as stored in different types of documents present in the HR records, such as curriculum vitae, staff exit forms, archived email correspondence, legal entity forms (LEF) and

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financial identification forms (BAF). The data was organised and structured in an excel table.

The legal basis of this processing is necessary for the management and functioning of the EBA for the performance of a task carried out in the public interest (Article 5.1.a EUDPR). The participation in this project is voluntary and certain personal data will be processed based on the data subject's consent (Article 5.1.d. EUDPR).

Participation in the network is on a voluntary basis. The HR unit will streamline this procedure by modifying the staff exit form that employees leaving the EBA have to fill as part of the offboarding procedure.

The database is regularly updated by the HR unit. This also includes erasing data relating to former employees who withdraw are no longer interest to be part of the network.

LinkedIn group/page: a specific LinkedIn Group/page will be created from the EBA main LinkedIn page, for the scope of disseminating the newsletter activity and posting different EBA Alumni information. The alumni will join the group via a specific link (fully consensual). The alumni will be able to exit the group at any time. LinkedIn may process the alumni personal data for their own purposes and under their own responsibility. Please consult [LinkedIn's privacy policy](#).

9 Description of categories of persons whose data the EBA processes and list of data categories

Data subjects include former statutory staff (temporary and contract agents) as well as Seconded National Experts, visiting or guest experts, members on staff exchange, and trainees. Other data subjects are the EBA current employees who are involved in the Coordination team, as well as HR unit members.

The personal data which can be processed for these data subjects includes **identification data**, such as the data subjects' names and surnames, gender, date of birth, nationality, place of residence. Moreover, it includes **contact data**, such as personal and/or professional emails, phone number, postal address, **career data**, such as the identification of former EBA departments/units in which the data subjects were employed, their former and current job titles, and the current professional status and place of employment. In addition, can be processed photographs and audio-visual

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		<p>recordings, for specific activities requiring these data, such as testimonials, interviews, etc.</p> <p>The mandatory data for the scope of running the project are name, surname, and contact data e.g. email address. While all the other data categories will be optional.</p>
10	Special categories of personal data processed (as defined in Article 10 EUDPR)	No special categories of personal data are specifically required for this processing activity.
11	Time limit for keeping the data	<p>Data will be stored as long as the Alumni remain part of the EBA Alumni network, which is of ongoing nature and will be deleted, should the data subject request the deletion, or should the project be terminated.</p> <p>Whenever it appears that a member might be inactive or that the email address is disactivated the personal data will be deleted.</p>
12	Recipients of the data	<p>The data is made available for consultation and use, on a need-to-know basis, to the responsible actors outside the HR unit (Alumni Coordination team) for the purpose of running the specific Alumni activities. Data will be stored on the EBA drives, relevant Teams channels, as applicable.</p> <p>Certain personal data will be available to LinkedIn.</p>
13	Are there any transfers of personal data to third countries or international organisations?	The personal data is processed by the EBA within the EU/EEA and will not leave that territory.
14	General description of security measures, where possible	<p>Processing of personal data in the context of this processing activity is carried out pursuant to the EBA Decision (EBA/DC/138) of 29 October 2015 on the security of communication and information systems in the EBA. The EBA adopted Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission. Processing is performed under the EBA Information Security Framework published on the EBA intranet. Those security controls include access control and authentication policy and technical controls; backup; audit trails; physical security policy and technical controls; patch management policy; data processing agreements (DPAs) are in place with Event planners.</p>
15	For more information, including how to exercise	The Data Protection Notice is communicated directly to the data subjects by email.

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your rights to access,
rectification, object and data
portability (where
applicable), see the data
protection notice:
